

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA

v.

MARK JORDAN WILLIAMS

DOCKET NO. 3:24-cr-80-KDB

FACTUAL BASIS

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. On March 23, 2023 in Mecklenburg County within the Western District of North Carolina, the defendant, Mark Jordan Williams, with intent to cause death and serious bodily harm, did unlawfully take from the person and presence of L.C. by force, violence, and intimidation, a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, that is, a 2021 Jeep Wrangler sports utility vehicle, in violation of Title 18, United States Code, Section 2119.

2. L.C. was driving her mother's Jeep Wrangler when L.C. parked in a public parking lot on the campus of University of North Carolina-Charlotte the afternoon of March 23, 2023.

3. Williams approached the Jeep while L.C. was still seated in the driver's seat before L.C. turned the vehicle off. The defendant pointed a handgun at L.C. and ordered L.C. out of the car. Williams then took L.C.'s phone, got into the Jeep, and drove away.

4. Williams was arrested later that evening while inside the Jeep taken from L.C. A .40 caliber Polymer 80 handgun was recovered from inside the vehicle as well.

5. The defendant, Mark Jordan Williams, knowingly possessed and brandished a firearm in furtherance of the March 23, 2023 Jeep Wrangler carjacking for which the defendant may be prosecuted in a court of the United States. in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

DENA J. KING
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Indictment, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Indictment, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.



Darrin Dupree Jordan, Esq., Attorney for Defendant

DATED: 12/12/24